

WATSON ROUNDS

Matthew D. Francis
Nevada Bar No. 6978

Arthur A. Zorio
State Bar No. 6547
5371 Kietzke Lane
Reno, NV 89511

Telephone: (775) 324-4100

Facsimile: (775) 333-8171

Email: mfrancis@watsonrounds.com

Email: azorio@watsonrounds.com

CHOI CAPITAL LAW

Boyoon Choi (*Pro Hac Vice to be Submitted*)

Washington Bar No. 44939

Frank Homsher (*Pro Hac Vice to be Submitted*)

Washington Bar No. 26935

520 Pike Tower, Suite 975

Seattle, WA 98101

Telephone: (206) 588-0463

Facsimile: (206) 971-1650

Email: b.choi@choicapitallaw.com

Email: f.homsher@choicapitallaw.com

Attorneys for Plaintiff

Samick Musical Instruments Co., Ltd.

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

SAMICK MUSICAL INSTRUMENTS CO.,
LTD., a Korean limited company,

Plaintiff,

vs.

QRS MUSIC TECHNOLOGIES, INC., a
Delaware corporation; THOMAS DOLAN, an
Individual,

Defendants.

Case No. 3:14-CV-00618

**PLAINTIFF'S MOTION TO FILE
COMPLAINT AND EXHIBITS UNDER
SEAL; [PROPOSED] ORDER**

Plaintiff Samick Musical Instruments Co., Ltd. ("Plaintiff" or "Samick") hereby moves
this Court for an order sealing Plaintiff Samick's Complaint and Exhibits. These documents are
filed concurrently with this Motion.

1 In January 2010, Plaintiff Samick and QRS Music Technologies, Inc. ("Defendant QRS")
2 entered into an Agreement. *See* December 1, 2014 declaration of Matthew D. Francis, ¶ 2. This
3 Agreement forms the basis for the majority of the claims being presently asserted by Plaintiff
4 Samick against Defendant QRS. *Id.* The 2010 Agreement contains a strict confidentiality
5 provision prohibiting disclosure of the terms of the 2010 Agreement and its accompanying
6 Exhibits to any third party. *Id.*

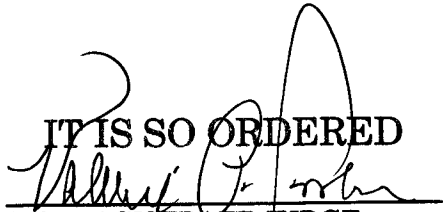
7 Seeking to honor this Agreement and not breach the terms of the confidentiality
8 provision, Plaintiff seeks permission to file the full version of the Complaint, the 2010
9 Agreement and its Attachments under seal. *Id.* at ¶ 3. A redacted version of the Complaint with
10 non-confidential Exhibits A and B has been filed to initiate this lawsuit. *Id.* As stated above, the
11 Complaint has been redacted because many of the facts and causes of action refer directly to the
12 terms of the 2010 Agreement. *Id.*

13 LR 10-5(b) provides in part "...papers filed with the Court under seal shall be
14 accompanied by a motion for leave to file those documents under seal, and shall be filed in
15 accordance with the Court's electronic filing procedures."

16 In good faith, seeking to honor and not breach the terms of the parties' 2010 Agreement,
17 Plaintiff Samick requests that this Court grant its Motion to file the un-redacted Complaint, 2010
18 Agreement and Exhibits under seal.

19 Dated: December 1, 2014

20
21
22
23
24
25
26
27
28

IT IS SO ORDERED

U.S. MAGISTRATE JUDGE
DATED: December 18, 2014

By: /s/ Matthew D. Francis
WATSON ROUNDS
Matthew D. Francis
Arthur A. Zorio
5371 Kietzke Lane
Reno, NV 89511

Attorneys for Plaintiff
Samick Musical Instruments Co., Ltd.

IT IS SO ORDERED:

UNITED STATES DISTRICT JUDGE

DATED: _____

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

DECLARATION OF MATTHEW D. FRANCIS

I, Matthew D. Francis, do hereby declare and state as follows:

1. I am a partner at the law firm of Watson Rounds located at 5371 Kietzke Lane, Reno, Nevada 89511. This declaration is based upon my personal knowledge, and is made in support of Plaintiff Samick Musical Instruments Co., Ltd. ("Plaintiff" or "Samick") Motion to File Complaint and Exhibits Under Seal.

2. In January 2010, Plaintiff Samick and QRS Music Technologies, Inc. ("Defendant QRS") entered into an Agreement. This Agreement forms the basis for the majority of the claims being presently asserted by Plaintiff Samick against Defendant QRS. The 2010 Agreement contains a strict confidentiality provision prohibiting disclosure of the terms of the 2010 Agreement and its accompanying Exhibits to any third party.

3. Seeking to honor this Agreement and not breach the terms of the confidentiality provision, Plaintiff seeks permission to file the full version of the Complaint, the 2010 Agreement and its Attachments under seal. A redacted version of the Complaint with non-confidential Exhibits A and B has been filed to initiate this lawsuit. As stated above, the Complaint has been redacted because many of the facts and causes of action refer directly to the terms of the 2010 Agreement.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: December 1, 2014

By: /s/ Matthew D. Francis
MATTHEW D. FRANCIS